

IN THE UNITED STATES DISTRICT COURT
FOR THE OF ARIZONA

Plaintiff(s) named below, for their Complaint against Defendants named below, incorporate the Master Complaint for Damages in MDL 2641 by reference (doc. 364). Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Florence Edwards

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium claim:

Jeff M Edwards Cindy McKinzie

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

N/ACindy McKinzie, administrator

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of implant:

Texas

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of the injury:

Texas

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

1 Texas

2 7. District Court and Division in which venue would be proper absent direct
3 filing:

4 Western District of Texas – Austin Division

5 8. Defendants (check Defendants against whom Complaint is made):

6 C.R. Bard Inc.

7 Bard Peripheral Vascular, Inc.

8 9. Basis of Jurisdiction:

9 Diversity of Citizenship

10 Other: _____

11 a. Other allegations of jurisdiction and venue not expressed in Master
12 Complaint:
13 _____
14 _____
15 _____

16 10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making
17 claim (Check applicable Inferior Vena Cava Filter(s)):

18 Recovery® Vena Cava Filter

19 G2® Vena Cava Filter

20 G2® Express (G2® X) Vena Cava Filter

21 Eclipse® Vena Cava Filter

22 Meridian® Vena Cava Filter

23 Denali® Vena Cava Filter

24 Other: _____

25 11. Date of Implantation as to each product:

26 On or about April 12, 2005

27 28 12. Counts in the Master Complaint brought by Plaintiff(s):

1 X Count I: Strict Products Liability – Manufacturing Defect

2 X Count II: Strict Products Liability – Information Defect (Failure to
3 Warn)

4 X Count III: Strict Products Liability – Design Defect

5 X Count IV: Negligence – Design

6 X Count V: Negligence – Manufacture

7 X Count VI: Negligence – Failure to Recall/Retrofit

8 X Count VII: Negligence – Failure to Warn

9 X Count VIII: Negligent Misrepresentation

10 X Count IX: Negligence *Per Se*

11 X Count X: Breach of Express Warranty

12 X Count XI: Breach of Implied Warranty

13 X Count XII: Fraudulent Misrepresentation

14 X Count XIII: Fraudulent Concealment

15 X Count XIV: Violation of Applicable Texas
16 Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade
17 Practices

18 X Count XV: Loss of Consortium

19 X Count XVI: Wrongful Death

20 X Count XVII: Survival

21 X Punitive Damages

22 Other(s): All claims for relief set forth in the Master Complaint for
23 an amount to be determined by the trier of fact.

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2 13. Jury Trial demanded for all issues so triable?

3 X Yes

4 No

5 Respectfully submitted this 5th day of April, 2016

6 **Jeff M Edwards, Plaintiff**

7 By: /s/ Jeff M Edwards

8 **Jeff M Edwards**

9 **13785 Research Blvd**

10 **Suite 125**

11 **Austin, TX 78750**

12 **Phone: (512)300-7555**

13 **Email: JeffEdwards777@Gmail.com**

14 ***Plaintiff filing Pro Se***

15 **RESPECTFULLY SUBMITTED November 29, 2016.**

16

17 By: /s/ Richard S. Lewis

18 **Richard S. Lewis**

19 **Steve Rotman**

20 **Braden Beard**

21 **HAUSFELD LLP**

22 **1700 K Street NW, Suite 650**

23 **Washington, DC 20006**

24 **Telephone: (202) 540-7200**

25 **Facsimile: (202) 540-7201**

26 **Email: rslewis@hausfeld.com**

27 **srotman@hausfeld.com**

28 **bbeard@hausfeld.com**

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2 **CERTIFICATE OF SERVICE**
3

4 I hereby certify that on November 29, 2016, I electronically transmitted the
5 attached document to the Clerk's Office using the CM/ECF System for filing and
6 transmittal of a Notice of Electronic Filing.

7 /s/ Richard S. Lewis _____
8 Richard S. Lewis
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